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Attorney for Petitioner, HYE KYUNG JOUNG

FILED
Superior Court Of California
County Of Los Angeles

JUN 14 2018

Shawn R. Castor, Executive Officer/Clerk
By Cristina Grijalva, Deputy
Cristina Grijalva

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

HYE KYUNG JOUNG, an Individual;

Petitioner,

vs.

CITY OF LOS ANGELES, a California Public
Agency; HERB J. WESSON JR. d/b/a THE
OFFICE OF COUNCILMAN HERB J.
WESSON, JR.; and DOES 1 through 50,
inclusive,

Respondents.

Unlimited Civil Case

BS174024

Case Number:

**PETITION FOR WRIT OF MANDATE
UNDER GOV. CODE § 6250 ET SEQ.
[PUBLIC RECORDS ACT]**

Petitioner HYE KYUNG JOUNG ("Joung" or "Petitioner") alleges as follows:

GENERAL ALLEGATIONS

1. Petitioner is, and at all times mentioned herein was, an individual residing in Los Angeles County, California.
2. Petitioner is, and at all times mentioned herein was, a resident of the City of Los Angeles, residing in City District 10.
3. Petitioner is informed and believes, and based thereon alleges, that the CITY OF LOS ANGELES ("CITY OF L.A.") is, and at all times herein relevant was, a charter city and

CII/CASE: BS174024
LEA/DEF#:

RECEIPT #: CCH195707046
DATE PAID: 06/14/18 02:47 PM
PAYMENT: \$435.00 310
RECEIVED:

CHECK: \$0.00
CASH: \$0.00
CHANGE: \$0.00
CARD: \$435.00

D86
Hague

8107/71/90

1 municipal corporation organized and existing under the laws of the state of California,
2 and operating in the County of Los Angeles, State of California, with its principal place
3 of business located at 200 N. Spring Street, Los Angeles, CA 90012.

4 4. Petitioner is informed and believes, and based thereon alleges, that HERB J. WESSON,
5 JR. d/b/a THE OFFICE OF COUNCILMAN HERB J. WESSON, JR., ("WESSON'S
6 OFFICE", together with the CITY OF L.A. "Respondents") is, and at all times herein
7 relevant was, the President of the Los Angeles City Council and the representative of
8 City Council District 10, and in this capacity served as a public agency acting as the
9 governing body of Los Angeles City District 10, organized and existing under the laws of
10 the state of California, and operating in the County of Los Angeles, State of California,
11 with its principal place of business located at 1819 S. Western Avenue, Los Angeles, CA
12 90006.

13 5. The true names and capacities of Respondents sued herein as DOES 1 through 50 are
14 unknown to Petitioner at this time, and therefore, Petitioner sues said Respondents by
15 such fictitious names. Petitioner will seek leave to amend this complaint to allege their
16 true names and capacities when the same have been ascertained. Petitioner is informed
17 and believes, and based thereon alleges, that each of Respondents designated as a DOE is
18 responsible in some manner for the events alleged herein and the damages caused
19 thereby.

20 6. Petitioner is informed and believes and thereupon alleges that at all times relevant hereto
21 each of Respondents including DOES 1 -50 acted in concert with each other, was the
22 agent, affiliate, officer, director, manager, principal, alter-ego, and/or employee of the
23 remaining Respondents and was at all times acting within the scope of such agency,
24 affiliation, alter-ego relationship and/or employment; and actively participated in or
25 subsequently ratified and adopted, or both, each and all of the acts or conducts alleged,
26 with full knowledge of all the facts and circumstances, including without limitation to full
27 knowledge of each and every wrongful conducts and Petitioner's damages caused
28 therefrom.

1 **1st CAUSE OF ACTION: IMPROPER WITHHOLDING OF**
2 **PUBLIC RECORDS UNDER GOV. CODE § 6250 ET SEQ.**

- 3 7. Petitioner repeats and alleges all the allegations stated herein, and incorporates by this
4 reference each and every allegation contained therein as though fully set forth herein.
- 5 8. Respondents are required to comply with Public Records Act, Government Code section
6 6253(b), which states "Except with respect to public records exempt from disclosure by
7 express provisions of law, each state or local agency, upon a request for a copy of records
8 that reasonably describes an identifiable record or records, shall make the records
9 promptly available to any person upon payment of fees covering direct costs of
10 duplication, or a statutory fee if applicable."
- 11 9. On or about May 9, 2018, Petitioner submitted a request for public records to Respondent
12 WESSON'S OFFICE, requesting access to and copies of specified public records under
13 the Public Records Act, Government Code section 6250, *et seq.* ("Public Records").
- 14 10. While Respondent WESSON'S OFFICE provided certain documents for Petitioner's
15 review, Respondent WESSON'S OFFICE has improperly withheld Public Records which
16 Petitioner is entitled to under Public Records Act, Government Code section 6250, *et seq.*
- 17 11. Such Public Records which Respondent WESSON'S OFFICE has improperly withheld
18 through failure to disclose or incomplete disclosures includes, but are not limited to, the
19 following documents that were requested by Petitioner in the public records request:
20
21 "1. ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating or
22 pertaining to the "Emergency Homeless Shelter" at 682 South Vermont Avenue, Los
23 Angeles, CA 90005, including without limitation to meeting minutes, notes, records,
24 reports, analysis, telephone logs, statistical data, inquiries, correspondences, emails,
25 plans, pictures, drawings, internal memo, etc., made, reviewed, seen, discussed,
26 considered, sent or received by City Councilman Herb Wesson or anyone in his offices
27 such as staff[], contractors, experts, advisors, secretaries, or employees at any time on or
28 after 1/1/2017."

1 **Documents withheld:** Several documents are absent from the records disclosed
2 by Respondent WESSON'S OFFICE, including but not limited to: (a) in-depth
3 assessments of the viability of 682 South Vermont as a homeless shelter site; (b)
4 records of prior consultation with any committees, community groups, or
5 community representatives prior to selecting 682 South Vermont as a homeless
6 shelter site; (c) all data and statistics considered when determining whether to
7 select 682 South Vermont for a homeless shelter site, and the sources of this
8 information; (d) evaluations of existing shelters to help inform the operation of a
9 new homeless shelter at 682 South Vermont; (e) any expert reports, interviews,
10 and emails from Councilman Wesson himself regarding 682 South Vermont; (f)
11 emails, text messages, or any other documents sent to or from, reviewed by,
12 considered by, or approved by Council President Wesson himself or his staff,
13 contractors, experts, advisors, secretaries, or employees. Petitioner requests that
14 all other records responsive to this request be disclosed, or that Respondent
15 WESSON'S OFFICE state that no other such records exist.

16
17 "2. ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating
18 and/or pertaining to the "Emergency Homeless Shelter" at 682 South Vermont Avenue,
19 Los Angeles, CA 90005, including without limitation to meeting minutes, notes, records,
20 reports, analysis, telephone logs, statistical data, inquiries, correspondences, emails,
21 plans, pictures, drawings, internal memo, etc., made, reviewed, seen, discussed,
22 considered, sent or received by City Mayor Eric Garcetti or anyone in his offices such as
23 staff[], contractors, experts, advisors, secretaries, or employees at any time on or after
24 1/1/2017."

25 **Documents withheld:** No records of discussions between Respondent
26 WESSON'S OFFICE or anyone in WESSON'S OFFICE and City Mayor Eric
27 Garcetti or anyone in Mayor Garcetti's office that are responsive to this request
28 were disclosed. In particular, no emails, text messages, or any other documents

1 sent to or from, reviewed by, considered by, or approved by Council President
2 Wesson himself and/or Mayor Garcetti were produced. Petitioner requests that all
3 other records responsive to this request be disclosed, or that Respondent
4 WESSON'S OFFICE state that no other such records exist.

5
6 "3. ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating
7 and/or pertaining to the "Emergency Homeless Shelter" at 682 South Vermont Avenue,
8 Los Angeles, CA 90005, including without limitation to meeting minutes, notes, records,
9 reports, analysis, telephone logs, statistical data, inquiries, correspondences, emails,
10 plans, pictures, drawings, internal memo, etc., made, reviewed, seen, discussed,
11 considered, sent or received by any Los Angeles City Councilmen including Councilman
12 David Ryu or anyone in his or her offices such as staff[], contractors, experts, advisors,
13 secretaries, or employees at any time on or after 1/1/2017."

14 **Documents withheld:** No records of discussions between Respondent
15 WESSON'S OFFICE or anyone in WESSON'S OFFICE and Councilman David
16 Ryu or anyone in Councilman David Ryu's office that are responsive to this
17 request were disclosed. In particular, no emails, text messages, or any other
18 documents sent to or from, reviewed by, considered by, or approved by Council
19 President Wesson himself and/or his counterpart(s) were produced. Petitioner
20 requests that all other records responsive to this request be disclosed, or that
21 Respondent WESSON'S OFFICE state that no other such records exist.

22
23 "4. ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating
24 and/or pertaining to the "Emergency Homeless Shelter" at 682 South Vermont Avenue,
25 Los Angeles, CA 90005, including without limitation to meeting minutes, notes, records,
26 reports, analysis, telephone logs, statistical data, inquiries, correspondences, emails,
27 plans, pictures, drawings, internal memo, etc., made, reviewed, seen, discussed,
28 considered, sent or received by the Los Angeles City Council or anyone in its offices

1 such as staff[], contractors, experts, advisors, secretaries, or employees at any time on or
2 after 1/1/2017.”

3 **Documents withheld:** Very few, if any, records of discussions between
4 Respondent WESSON’S OFFICE or anyone in WESSON’S OFFICE and the Los
5 Angeles City Council or anyone in its offices regarding 682 South Vermont were
6 disclosed. In particular, no emails, text messages, or any other documents sent to
7 or from, reviewed by, considered by, or approved by Council President Wesson
8 himself and/or his counterpart(s) were produced. Petitioner requests that all
9 records responsive to this request be disclosed, or that Respondent WESSON’S
10 OFFICE state that no other such records exist.

11
12 “5. ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating
13 and/or pertaining to the “Emergency Homeless Shelter” at 682 South Vermont Avenue,
14 Los Angeles, CA 90005, including without limitation to meeting minutes, notes, records,
15 reports, analysis, telephone logs, statistical data, inquiries, correspondences, emails,
16 plans, pictures, drawings, internal memo, etc., made, reviewed, seen, discussed,
17 considered, sent or received by the Los Angeles City Office and/or any of its staff[],
18 contractors, experts, advisors, secretaries, or employees at any time on or after 1/1/2017.”

19 **Documents withheld:** The records of discussions between Respondent
20 WESSON’S OFFICE or anyone in WESSON’S OFFICE and the Los Angeles
21 City Office or anyone at the Los Angeles City Office are limited. As mentioned
22 above, several documents are absent from the records disclosed by Respondent
23 WESSON’S OFFICE, including but not limited to: (a) in-depth assessments of the
24 viability of 682 South Vermont as a homeless shelter site; (b) records of prior
25 consultation with any committees, community groups, or community
26 representatives prior to selecting 682 South Vermont as a homeless shelter site;
27 (c) all data and statistics considered when determining whether to select 682
28 South Vermont for a homeless shelter site, and the sources of this information; (d)

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1 evaluations of existing shelters to help inform the operation of a new homeless
2 shelter at 682 South Vermont; (e) any expert reports, interviews, and emails from
3 Councilman Wesson himself regarding 682 South Vermont. In particular, no
4 emails, text messages, or any other documents sent to or from, reviewed by,
5 considered by, or approved by Council President Wesson himself and/or his
6 counterpart(s) were produced. Petitioner requests that all other records responsive
7 to this request be disclosed, or that Respondent WESSON'S OFFICE state that no
8 other such records exist.

9
10 "6. ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating or
11 pertaining to the "Emergency Homeless Shelter" at any location in Los Angeles, CA,
12 including without limitation to meeting minutes, notes, records, reports, analysis,
13 telephone logs, statistical data, inquiries, correspondences, emails, plans, pictures,
14 drawings, internal memo, etc., made, reviewed, seen, discussed, considered, sent or
15 received by City Councilman Herb Wesson or anyone in his offices such as staff[],
16 contractors, experts, advisors, secretaries, or employees at any time on or after 1/1/2017."

17 **Documents withheld:** Several documents are absent from the records disclosed
18 by Respondent WESSON'S OFFICE, including but not limited to: (a) in-depth
19 assessments of the viability of other potential homeless shelter sites in Los
20 Angeles; (b) records of prior consultation with any committees, community
21 groups, or community representatives regarding potential homeless shelter sites in
22 Los Angeles; (c) all data and statistics regarding homelessness in Los Angeles and
23 elsewhere considered when determining which homeless shelter sites to select; (d)
24 evaluations of existing shelters in Los Angeles and elsewhere to help inform the
25 operation of any new homeless shelters; (e) any expert reports, interviews, and/or
26 consultations regarding potential homeless shelter sites in Los Angeles. In
27 particular, no emails, text messages, or any other documents sent to or from,
28 reviewed by, considered by, or approved by Council President Wesson himself

1 and/or his counterpart(s) were produced. Petitioner requests that all other records
2 responsive to this request be disclosed, or that Respondent WESSON'S OFFICE
3 state that no other such records exist.
4

5 "7. ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating
6 and/or pertaining to the "Emergency Homeless Shelter" at any location in Los Angeles,
7 CA, including without limitation to meeting minutes, notes, records, reports, analysis,
8 telephone logs, statistical data, inquiries, correspondences, emails, plans, pictures,
9 drawings, internal memo, etc., made, reviewed, seen, discussed, considered, sent or
10 received by City Mayor Eric Garcetti or anyone in his offices such as staff[], contractors,
11 experts, advisors, secretaries, or employees at any time on or after 1/1/2017."

12 **Documents withheld:** No records of discussions between Respondent
13 WESSON'S OFFICE or anyone in WESSON'S OFFICE and City Mayor Eric
14 Garcetti or anyone in Mayor Garcetti's office that are responsive to this request
15 were disclosed. In particular, no emails, text messages, or any other documents
16 sent to or from, reviewed by, considered by, or approved by Council President
17 Wesson himself and/or his counterpart(s) were produced. Petitioner requests that
18 all other records responsive to this request be disclosed, or that Respondent
19 WESSON'S OFFICE state that no other such records exist.
20

21 "8. ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating
22 and/or pertaining to the "Emergency Homeless Shelter" at any location in Los Angeles,
23 CA, including without limitation to meeting minutes, notes, records, reports, analysis,
24 telephone logs, statistical data, inquiries, correspondences, emails, plans, pictures,
25 drawings, internal memo, etc., made, reviewed, seen, discussed, considered, sent or
26 received by any Los Angeles City Councilmen including Councilman David Ryu or
27 anyone in his or her offices such as staff[], contractors, experts, advisors, secretaries, or
28 employees at any time on or after 1/1/2017."

06/14/2018

1 **Documents withheld:** No records of discussions between Respondent
2 WESSON'S OFFICE or anyone in WESSON'S OFFICE and Councilman David
3 Ryu or anyone in Councilman David Ryu's office that are responsive to this
4 request were disclosed. In particular, no emails, text messages, or any other
5 documents sent to or from, reviewed by, considered by, or approved by Council
6 President Wesson himself and/or his counterpart(s) were produced. Petitioner
7 requests that all other records responsive to this request be disclosed, or that
8 Respondent WESSON'S OFFICE state that no other such records exist.

9
10 "9. ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating
11 and/or pertaining to the "Emergency Homeless Shelter" at any location in Los Angeles,
12 CA, including without limitation to meeting minutes, notes, records, reports, analysis,
13 telephone logs, statistical data, inquiries, correspondences, emails, plans, pictures,
14 drawings, internal memo, etc., made, reviewed, seen, discussed, considered, sent or
15 received by the Los Angeles City Council or anyone in its offices such as staff[],
16 contractors, experts, advisors, secretaries, or employees at any time on or after 1/1/2017."

17 **Documents withheld:** Very few, if any, records of discussions between
18 Respondent WESSON'S OFFICE or anyone in WESSON'S OFFICE and the Los
19 Angeles City Council or anyone in its offices regarding Emergency Homeless
20 Shelters at any location in Los Angeles were produced by Respondent
21 WESSON'S OFFICE. In particular, no emails, text messages, or any other
22 documents sent to or from, reviewed by, considered by, or approved by Council
23 President Wesson himself and/or his counterpart(s) were produced. Petitioner
24 requests that all records responsive to this request be disclosed, or that
25 Respondent WESSON'S OFFICE state that no other such records exist.

26
27 "10. ALL DOCUMENTS referring to, analyzing, commenting, considering, evaluating
28 and/or pertaining to the "Emergency Homeless Shelter" at any location in Los Angeles,

1 CA, including without limitation to meeting minutes, notes, records, reports, analysis,
2 telephone logs, statistical data, inquiries, correspondences, emails, plans, pictures,
3 drawings, internal memo, etc., made, reviewed, seen, discussed, considered, sent or
4 received by the Los Angeles City Office and/or any of its staff[], contractors, experts,
5 advisors, secretaries, or employees at any time on or after 1/1/2017.”

6 **Documents withheld:** The records of discussions between Respondent
7 WESSON’S OFFICE or anyone in WESSON’S OFFICE and the Los Angeles
8 City Office or anyone at the Los Angeles City Office are limited. As mentioned
9 above, several documents are absent from the records disclosed by Respondent
10 WESSON’S OFFICE, including but not limited to: (a) in-depth assessments of the
11 viability of other potential homeless shelter sites in Los Angeles; (b) records of
12 prior consultation with any committees, community groups, or community
13 representatives regarding potential homeless shelter sites in Los Angeles; (c) all
14 data and statistics regarding homelessness in Los Angeles and elsewhere
15 considered when determining which homeless shelter sites to select; (d)
16 evaluations of existing shelters in Los Angeles and elsewhere to help inform the
17 operation of any new homeless shelters; (e) any expert reports, interviews, and/or
18 consultations regarding potential homeless shelter sites in Los Angeles. In
19 particular, no emails, text messages, or any other documents sent to or from,
20 reviewed by, considered by, or approved by Council President Wesson himself
21 and/or his counterpart(s) were produced. Petitioner requests that all other records
22 responsive to this request be disclosed, or that Respondent WESSON’S OFFICE
23 state that no other such records exist.

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27 WHEREFORE, Petitioner prays for judgment against all Respondents as follows:
28

1 AS TO THE ALL CAUSES OF ACTION AGAINST ALL RESPONDENTS:

- 2 1. For equitable relief in the form of a writ of mandate commanding Respondents CITY OF
3 L.A. and WESSON'S OFFICE to comply with the Public Records Act by promptly
4 providing to Petitioner all of the requested Public Records, including without limitation,
5 Public Records that have been withheld by Respondent WESSON'S OFFICE as
6 indicated in paragraph 11;
7 2. For costs of suit incurred in enforcing Petitioner's rights under the Public Records Act;
8 3. For attorneys' fees incurred in enforcing Petitioner's rights under the Public Records Act;
9 4. For such other and further relief as this court shall deem just and proper.

10
11 Dated: June 14, 2018

Respectfully submitted,

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14 C. Yong Jeong, Esq.
15 Regina Zernay, Esq.
16 Attorneys for HYE KYUNG JOUNG
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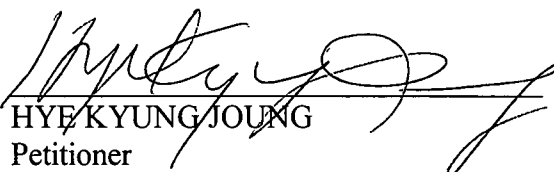
VERIFICATION

I, HYE KYUNG JOUNG, declare:

I am the Petitioner in this proceeding. I have read the foregoing Petition, and the matters stated in it are true of my own knowledge, except as to those matters that are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the law of the State of California that the foregoing is true and correct.

Executed on June __, 2018


HYE KYUNG JOUNG
Petitioner

06/14/2018

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Chan Yong Jeong, Esq. (SBN 255244); Regina Zernay, Esq. (SBN 318228) JEONG & LIKENS, L.C. 222 South Oxford Avenue Los Angeles, CA 90004 TELEPHONE NO.: 213-688-2001 FAX NO.: 213-315-5035 ATTORNEY FOR (Name): Petitioner, HYE KYUNG JOUNG		FOR COURT USE ONLY FILED Superior Court of California County of Los Angeles JUN 14 2018 Shoni R. Cantor, Executive Officer/Clerk By <u>Cristina Grijalva</u> , Deputy	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central District, Stanley Mosk Courthouse		CASE NAME: HYE KYUNG JOUNG, an Individual v. CITY OF LOS ANGELES, a California Public Agency; HERB J. WESSON JR. d/b/a THE OFFICE OF COUNCILMAN HERB J. WESSON, JR.; and DOES 1 through 50, inclusive	
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)		Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	
		CASE NUMBER: BS174024 JUDGE: DEPT:	

Items 1-6 below must be completed (see instructions on page 2).

1. Check **one** box below for the case type that best describes this case:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input checked="" type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

a. <input type="checkbox"/> Large number of separately represented parties b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve c. <input type="checkbox"/> Substantial amount of documentary evidence	d. <input type="checkbox"/> Large number of witnesses e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court f. <input type="checkbox"/> Substantial postjudgment judicial supervision
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3. Remedies sought (check all that apply): a. ☒ monetary b. ☒ nonmonetary; declaratory or injunctive relief c. ☒ punitive

4. Number of causes of action (specify): 1

5. This case ☐ is ☒ is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: June 14, 2018

Chan Yong Jeong

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

06/14/2018

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort

Auto (22)—Personal Injury/Property Damage/Wrongful Death
Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)
Asbestos Property Damage
Asbestos Personal Injury/Wrongful Death
Product Liability (*not asbestos or toxic/environmental*) (24)
Medical Malpractice (45)
Medical Malpractice—Physicians & Surgeons
Other Professional Health Care Malpractice
Other PI/PD/WD (23)
Premises Liability (e.g., slip and fall)
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
Intentional Infliction of Emotional Distress
Negligent Infliction of Emotional Distress
Other PI/PD/WD

Non-PI/PD/WD (Other) Tort

Business Tort/Unfair Business Practice (07)
Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)
Defamation (e.g., slander, libel) (13)
Fraud (16)
Intellectual Property (19)
Professional Negligence (25)
Legal Malpractice
Other Professional Malpractice (*not medical or legal*)
Other Non-PI/PD/WD Tort (35)

Employment

Wrongful Termination (36)
Other Employment (15)

Contract

Breach of Contract/Warranty (06)
Breach of Rental/Lease Contract (*not unlawful detainer or wrongful eviction*)
Contract/Warranty Breach—Seller Plaintiff (*not fraud or negligence*)
Negligent Breach of Contract/Warranty
Other Breach of Contract/Warranty
Collections (e.g., money owed, open book accounts) (09)
Collection Case—Seller Plaintiff
Other Promissory Note/Collections Case
Insurance Coverage (*not provisionally complex*) (18)
Auto Subrogation
Other Coverage
Other Contract (37)
Contractual Fraud
Other Contract Dispute

Real Property

Eminent Domain/Inverse Condemnation (14)
Wrongful Eviction (33)
Other Real Property (e.g., quiet title) (26)
Writ of Possession of Real Property
Mortgage Foreclosure
Quiet Title
Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

Unlawful Detainer

Commercial (31)
Residential (32)
Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

Judicial Review

Asset Forfeiture (05)
Petition Re: Arbitration Award (11)
Writ of Mandate (02)
Writ—Administrative Mandamus
Writ—Mandamus on Limited Court Case Matter
Writ—Other Limited Court Case Review
Other Judicial Review (39)
Review of Health Officer Order
Notice of Appeal—Labor Commissioner Appeals

Provisionally Complex Civil Litigation (Cal.

Rules of Court Rules 3.400–3.403)

Antitrust/Trade Regulation (03)
Construction Defect (10)
Claims Involving Mass Tort (40)
Securities Litigation (28)
Environmental/Toxic Tort (30)
Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

Enforcement of Judgment

Enforcement of Judgment (20)
Abstract of Judgment (Out of County)
Confession of Judgment (*non-domestic relations*)
Sister State Judgment
Administrative Agency Award (*not unpaid taxes*)
Petition/Certification of Entry of Judgment on Unpaid Taxes
Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

RICO (27)
Other Complaint (*not specified above*) (42)
Declaratory Relief Only
Injunctive Relief Only (*non-harassment*)
Mechanics Lien
Other Commercial Complaint Case (*non-tort/non-complex*)
Other Civil Complaint (*non-tort/non-complex*)

Miscellaneous Civil Petition

Partnership and Corporate Governance (21)
Other Petition (*not specified above*) (43)
Civil Harassment
Workplace Violence
Elder/Dependent Adult Abuse
Election Contest
Petition for Name Change
Petition for Relief From Late Claim
Other Civil Petition

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SHORT TITLE: **Joung v. City of Los Angeles et al.**

CASE NUMBER **BS174024**

**CIVIL CASE COVER SHEET ADDENDUM AND
STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to Local Rule 2.3 in all new civil case filings in the Los Angeles Superior Court.

Step 1: After completing the Civil Case Cover Sheet (Judicial Council form CM-010), find the exact case type in Column A that corresponds to the case type indicated in the Civil Case Cover Sheet.

Step 2: In Column B, check the box for the type of action that best describes the nature of the case.

Step 3: In Column C, circle the number which explains the reason for the court filing location you have chosen.

Applicable Reasons for Choosing Court Filing Location (Column C)

1. Class actions must be filed in the Stanley Mosk Courthouse, Central District.
2. Permissive filing in central district.
3. Location where cause of action arose.
4. Mandatory personal injury filing in North District.
5. Location where performance required or defendant resides.
6. Location of property or permanently garaged vehicle.
7. Location where petitioner resides.
8. Location wherein defendant/respondent functions wholly.
9. Location where one or more of the parties reside.
10. Location of Labor Commissioner Office.
11. Mandatory filing location (Hub Cases – unlawful detainer, limited non-collection, limited collection, or personal injury).

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1, 4, 11
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1, 4, 11
Other Personal Injury/ Property Damage/ Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	1, 11 1, 11
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1, 4, 11
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons	1, 4, 11
		<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1, 4, 11
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1, 4, 11
		<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1, 4, 11
		<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress	1, 4, 11
		<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1, 4, 11

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Non-Personal Injury/Property
Damage/Wrongful Death Tort

Employment

Contract

Real Property

Unlawful Detainer

A Civil Case Cover Sheet Category No	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1, 2, 3
Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1, 2, 3
Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1, 2, 3
Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1, 2, 3
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1, 2, 3 1, 2, 3
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	1, 2, 3
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1, 2, 3
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1, 2, 3 10
Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2, 5 2, 5 1, 2, 5 1, 2, 5
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case <input type="checkbox"/> A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)	5, 6, 11 5, 11 5, 6, 11
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1, 2, 5, 8
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1, 2, 3, 5 1, 2, 3, 5 1, 2, 3, 8, 9
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels_____	2, 6
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2, 6
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2, 6 2, 6 2, 6
Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	6, 11
Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	6, 11
Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2, 6, 11
Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2, 6, 11

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Joung v. City of Los Angeles et al.

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A Civil Case Cover Sheet Category No	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2, 3, 6
Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2, 5
Writ of Mandate (02)	<input checked="" type="checkbox"/> A6151 Writ - Administrative Mandamus	2, 8
	<input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter	2
	<input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2
Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2, 8
Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1, 2, 8
	<input type="checkbox"/> A6007 Construction Defect	1, 2, 3
	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1, 2, 8
	<input type="checkbox"/> A6035 Securities Litigation Case	1, 2, 8
	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1, 2, 3, 8
	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1, 2, 5, 8
Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment	2, 5, 11
	<input type="checkbox"/> A6160 Abstract of Judgment	2, 6
	<input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations)	2, 9
	<input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes)	2, 8
	<input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax	2, 8
	<input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2, 8, 9
RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1, 2, 8
Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only	1, 2, 8
	<input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment)	2, 8
	<input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex)	1, 2, 8
	<input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1, 2, 8
Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2, 8
Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment	2, 3, 9
	<input type="checkbox"/> A6123 Workplace Harassment	2, 3, 9
	<input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case	2, 3, 9
	<input type="checkbox"/> A6190 Election Contest	2
	<input type="checkbox"/> A6110 Petition for Change of Name/Change of Gender	2, 7
	<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law	2, 3, 8
	<input type="checkbox"/> A6100 Other Civil Petition	2, 9

SHORT TITLE: Joung v. City of Los Angeles et al.	CASE NUMBER
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Step 4: Statement of Reason and Address: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address which is the basis for the filing location, including zip code. (No address required for class action cases).

REASON: <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input type="checkbox"/> 11.			ADDRESS: 200 N. Spring Street
CITY: Los Angeles	STATE: CA	ZIP CODE: 90012	

Step 5: Certification of Assignment: I certify that this case is properly filed in the Central Judicial District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., §392 et seq., and Local Rule 2.3(a)(1)(E)].

Dated: June 14, 2018


 (SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 02/16).
5. Payment in full of the filing fee, unless there is court order for waiver, partial or scheduled payments.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

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